



Justin Lonergan  
601 W. Riverside Ave., Ste. 900  
Spokane, Washington 99201  
509-624-7606  
Attorneys for Andrei Borgheriu

United States District Court  
Eastern District of Washington  
Honorable Stanley A. Bastian

United States of America,

No: 4:22-cr-06040-SAB-1

Plaintiff,

## Defendant's Exhibit List - First

V.

Andrei Stephanovich Borgheriu,

## Defendant.

15

16

17

10

1 Mr. Borgheriu provides notice that he intends to introduce the following  
2 exhibits in his case in chief:

3 Defense Exhibit	4 Admitted	5 Description	6 Bates
1		Photograph – Mr. Borgheriu's Truck	FD00000070
2		Photograph – Home Office	FD00000003
3		Photograph – Garage Office Area	FD00000004
4		Photograph – Home Office	FD00000005
5		Photograph – Tires	FD00000006
6		Photograph – Inside of Shed	FD00000007
7		Photograph – Inside of Shed	FD00000008
8		Photograph – Tires	FD00000009
9		Artway Transport Check Stubs	FD00000016- FD00000061
10*		2022 Business License	FD00000062
11*		Transportation Certificate (first page subject to stipulation)	FD00000063- FD00000065
12		International Fuel Tax Agreement	FD00000066
13		Certificate of Insurance	FD00000067
14*		Employer Identification Number	FD00000068- FD00000069
15		Drivers Daily Log	FD00000071- FD00000194
16		Promissory Note	FD00000195- FD00000197
17		Registration Certificate	FD00000198
18		Vehicle Certificate of Title	FD00000199

1	19*	Secretary of State Certificate of Formation - 2018	FD00000221
2	20*	Secretary of State Amended Annual Report - 2018	FD00000200-FD00000202
3	21*	Secretary of State Annual Report - 2019	FD00000203-FD00000205
4	22*	Secretary of State Annual Report – 2020	FD00000206-FD00000208
5	23*	Secretary of State Express Annual Report with Changes – 2021	FD00000209-FD00000211
6	24*	Secretary of State Express Annual Report with Changes – 2022	FD00000212-FD00000214
7	25*	Secretary of State Annual Report – 2023	FD00000215-FD00000217
8	26*	Secretary of State Express Annual Report with Changes – 2024	FD00000218-FD00000220
9	27	Load Records	FD00000001-FD00000002
10	28	Business Receipts	FD00000010-FD00000015
11	29	Rights Advisement	FD10000043

\* Subject to parties' stipulation.

Mr. Borgheriu reserves the right to seek admission of any exhibit on the United States' exhibit list, to supplement this list as trial proceeds, or to present impeachment exhibits as many be appropriate during trial.

//

//

//

//

//

1 Dated: February 3, 2025

2 Federal Defenders of Eastern  
3 Washington and Idaho  
4 Attorneys for Andrei Borgheriu

5 *s/Justin Lonergan*  
6 Justin Lonergan, WA 55216  
7 601 W. Riverside Ave., Ste. 900  
8 Spokane, Washington 99201  
9 (509) 624-7606  
10 (509)747-3539 fax  
11 Justin\_Lonergan@fd.org

## 12 SERVICE CERTIFICATE

13 I hereby certify that, on February 3, 2025, I electronically filed the  
14 foregoing with the Clerk of the Court using the CM/ECF System, which will  
15 notify Assistant United States Attorneys Frieda K. Zimmerman and Jeremy  
16 James Kelley.

17 *s/Justin Lonergan*  
18 Justin Lonergan, WA 55216  
19 601 W. Riverside Ave., Ste. 900  
Defense Exhibit List - First  
- 4 -